

Blozis
Linda J. Blozis, Volume 1

v.
C.A. # 05-891 (SLR)

Mellon Trust of Delaware, et al.
July 26, 2006

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1 Q. Looking at the handwriting that says, "Greg - 2 Here are numbers," it's right below the printing. 3 A. Yes. 4 Q. Is that your handwriting? 5 A. Yes. I believe. Yes. 6 Q. And just looking at what it says, are you 7 asking Greg -- and that's Greg Landis? 8 A. Yes. 9 Q. Are you asking him to do something with respect 10 to this account? 11 A. To my understanding, yes. 12 Q. Now, did Greg ever say to you that he didn't 13 feel that that was what you should be asking him to 14 do; that you should be doing it yourself? 15 A. I don't recall that at this time. 16 Q. Did Bill Becker ever say to you that he felt 17 that you had asked Greg to do something that you 18 yourself should have done? 19 A. I don't recall. 20 Q. Did Bill Becker ever say to you with respect to 21 this account that it should have been done earlier? 22 A. On this particular client account? 23 Q. Yes. 24 A. I don't recall that.	1 part of Blozis 6 that has Bill Becker's, the BB by it 2 and information, did you ever go back to him and say 3 you disagreed with his characterization? 4 A. I don't recall at this time if I did. It would 5 seem a likelihood because I felt I had a good client 6 relationship with this particular client. 7 Q. So it's likely that you went back to him and 8 said, "I don't agree with what you said about it"? 9 A. I'm not sure at this time. It could have been. 10 Q. Now, you said before that with respect to this 11 particular client had moved from Pennsylvania to 12 Naples, Florida and that you're also a resident of 13 Naples, Florida. 14 When did you first become a resident of 15 Naples, Florida? 16 A. Not until after, a full-time resident not until 17 after I was dismissed from Mellon. 18 Q. But with respect to this client, that was 19 before you were dismissed? 20 A. Yes. I owned a property there and I would 21 visit the property and take the opportunity to visit 22 the client if it was beneficial to Mellon. 23 Q. When did you first own the property in Naples? 24 A. 1988.
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1 Q. Do you recall having any discussions regarding 2 this particular client account with Bill Becker? 3 A. Yes. 4 Q. And what do you recall? 5 A. This particular client lived in Naples and I -- 6 Q. Florida? 7 A. Yes. And to the best of my recollection, that 8 client had moved from Pennsylvania to Naples, Florida. 9 Hence, as a resident there myself, we struck up a 10 rapport. On one of my visits, I visited with the 11 client, something that's not typically done by a 12 portfolio administrator, had lunch with them, listened 13 to their feelings about the account, working on good 14 customer and client relations and knowing my limits 15 and liabilities of my job performance took back the 16 information to the investment officer and reported 17 back to Bill Becker on what the client had said at our 18 meeting. 19 Q. But in terms of any dissatisfaction that Bill 20 may have had with you concerning this particular 21 client, do you recall him expressing anything to you 22 personally? 23 A. No, I do not at this time. 24 Q. With respect to Blozis 6, looking down at the	1 Q. Did you live at that property? 2 A. No, not full time. 3 Q. Part time? 4 A. I lived in Delaware and worked at Mellon. 5 Q. Did you go, was that your summer place? 6 A. No. It was a rental property. 7 Q. When you went down to Naples did you stay at 8 that property? 9 A. When I could, when there weren't tenants... 10 Q. Tenants there? 11 A. Yes. 12 Q. When you were working with Bill Becker, did you 13 have to complete forms called the automated investment 14 review? Are you familiar with that term? 15 A. To the best of my recollection, I believe you 16 may be talking about... 17 Q. Go ahead. I'm just looking for it. Go ahead. 18 A. A trust investment review. 19 Q. It could be. 20 (Blozis Deposition Exhibit No. 7 was 21 marked for identification.) 22 BY MS. WILSON: 23 Q. Are you finished? 24 A. Yes. I'm sorry.

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1 Q. Mrs. Blozis, have you seen what's been marked
 2 as Blozis 7 before today?
 3 A. Yes. Well, to my recollection, this is
 4 familiar with things that I would have seen.
 5 Q. But in terms of whether you have seen this
 6 particular one, you're not sure?
 7 A. I'm not sure at this time if I have seen this
 8 particular one.
 9 The client name does sound familiar to me.
 10 Q. And it's called an automated investment review
 11 system?
 12 A. Yes. I understand that.
 13 Q. What is that?
 14 A. These were periodic reports produced on each
 15 and every client and their account. Some clients
 16 having multiple clients as I recognize this name and
 17 it would review basically the breakout of the
 18 portfolio into categories of either the money market,
 19 bond, stocks, the model mix, meaning whether it was
 20 large, mid cap or small cap stock. And it was for the
 21 investment officer to update that according to the
 22 client's instructions or change of instructions
 23 throughout the history of the account.
 24 Q. Would you have anything to do with putting the

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1 say, "MPAM Funds," do you know what that's referring
 2 to?
 3 A. I have a recollection, yes.
 4 Q. What's your recollection?
 5 A. Mellon had various portfolio models that they
 6 would oftentimes gear certain size relationships into
 7 instead of a myriad upon thousands and thousands.
 8 There were multiple accounts that fit certain model
 9 portfolios.
 10 And I would suspect that Becker is saying
 11 this account was now in a model and holding Mellon
 12 Private Asset Management Funds. I don't know, I don't
 13 recollect at this time why, if he wrote this note why
 14 he would have written this note.
 15 Q. As you sit here today, you don't remember
 16 having any conversations with him about this
 17 particular fund and whether there was an inconsistency
 18 with respect to holdings?
 19 A. I can't say at this time not having more
 20 information on this particular client.
 21 Q. Do you recall having any conversations with
 22 Becker, and not specific as to this client that we're
 23 looking at, but any conversations with Becker
 24 concerning inaccurate information on the automated

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1 information into the automated investment review
 2 system?
 3 A. Ultimately it was for the investment officer to
 4 finalize the input of information, as you say, into
 5 the works. It was the portfolio administrator, the
 6 assistant's job to compile information to present to
 7 him to make ultimate decisions of reallocation.
 8 Q. On the right-hand side with the handwriting,
 9 have you seen that before today?
 10 A. I'm not sure that I have.
 11 Q. Where it says, "LB - Inconsistent with
 12 holdings. Now in a model" and it looks to be MPAM
 13 Funds"?
 14 A. Yes.
 15 Q. Did you have any conversations with Becker
 16 concerning this particular account and there being an
 17 inconsistency?
 18 A. I don't recall at this time.
 19 Q. Now, with respect to when it says, "Now in a
 20 model and MPAM Funds," do you know what that means?
 21 A. That's an acronym for Mellon Private Asset
 22 Management Funds, MPAM Funds.
 23 And your question was?
 24 Q. Where it says, "Now in a model and," as you

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1 Investment review system?
 2 A. Did I have conversations with Bill on any
 3 client?
 4 Q. Let me rephrase that for you to make it easier.
 5 Did Bill Becker ever say to you that you
 6 had provided inaccurate, incomplete, wrong information
 7 as it related to information on the automated
 8 investment review system reports?
 9 A. That's a broad question. I don't recall him
 10 criticizing my providing information because
 11 information was derived from systems that were
 12 available to me. So I don't understand how you're
 13 saying did he -- did we have conversations about wrong
 14 information provided?
 15 You could punch in a client's name and get
 16 information. You could punch in a model request and
 17 get that information. So it's broad. I don't quite
 18 understand.
 19 Q. Let me see if I have a better example.
 20 (Blozis Deposition Exhibit No. 8 was
 21 marked for identification.)
 22 THE WITNESS: Are you waiting for me to
 23 say I see this?
 24 BY MS. WILSON:

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1 Q. Yes.
2 A. I see this.
3 Q. Have you seen Blozis 8 before today?
4 A. This looks consistent with the automated
5 investment review system sheets that I would have seen
6 many. I can't say specifically at this time that I
7 have seen the one that's referring to this particular
8 client.
9 Q. It says, "Recode to '5" on the right-hand
10 side?
11 A. Yes.
12 Q. "Balance Growth/Income"?
13 A. Yes.
14 Q. Do you know what that refers to?
15 A. It would have been to the best of my
16 recollection Bill Becker's instruction that upon
17 seeing this review to change the status of this
18 account to a coding of 5 in a mix of balanced growth
19 and income.
20 Q. Looking at the investment objective and it says
21 investment objective 007 growth, would that be where
22 you would recode it?
23 A. Yes. I'm thinking about this.
24 MR. LaROSA: Take your time.

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1 Q. So if I understand you correctly, Ms. Blozis,
2 the final determination of whether something should be
3 recoded or not was left to the portfolio
4 administrators to do?
5 A. The assistants. The assistants. The portfolio
6 administrating assistants, not to be confused with the
7 name of portfolio administrator which was given to
8 trust officers at some point in time.
9 Yes, you're correct in assuming that the
10 decision to change the coding was not left up to
11 either an investment assistant, portfolio assistant or
12 a trust assistant.
13 Q. Did Mr. Becker ever say to you that he wanted
14 you to be in a position to analyze data on the
15 automated investment review system and recode, give
16 him suggestions to recode, if necessary?
17 A. I recollect that there may have been
18 discussions about the job evolving. I'm not sure at
19 this time.
20 Q. During the time that you were working with
21 Mr. Becker do you remember doing any recoding on your
22 own?
23 A. Recoding? We're talking about decision-making.
24 I could never do a decision, I never did

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1 A. To the best of my recollection, yes, that would
2 be where it would be changed.
3 Q. But in terms of Blozis 8, I believe it's your
4 testimony that sitting here today you don't have a
5 specific recollection of this document?
6 A. Specifically seeing this? When you manage,
7 when you're responsible for over or between three and
8 500 accounts and that at the end of my employ accounts
9 were in a state of flux going back and forth between
10 teams, this specific document I can't perfectly say
11 that these were instructions that Bill gave to me
12 personally.
13 Q. All right. In terms of the investment
14 objective changing and recoding it to another number,
15 would that have been something that was your
16 responsibility to do on your own?
17 A. I don't recall at that time if the assistants
18 could recode, take it to a completion. To the best of
19 my recollection, we could have punched in the code,
20 but it was the investment officer's responsibility to,
21 in essence, throw the switch because that was the
22 finalization of the investment officer's review.
23 We could do the numbers, but the decision-
24 making was not left to the assistants.

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1 decision-making on my own. The investment officer
2 always had to direct or instruct the assistants to do
3 that.
4 Q. By that recoding would never be something you
5 would say, for example, I'm looking at this; I think
6 it should be recoded to a different number; I'm going
7 to do it? That would not be something that you would
8 just do on your own?
9 A. If I understand you correctly, it would never
10 be something I would just -- the capability wasn't
11 there for an assistant to recode. It always -- there
12 was a system of checks and balances whereby investment
13 officers were responsible for the ultimate decisions
14 on the accounts.
15 Q. With respect to the automated investment review
16 system sheets, did Mr. Becker want you to provide any
17 analysis to him concerning the information that you
18 were pulling?
19 A. I don't recall specifically at this time that
20 he did.
21 Q. Looking down, for example, on Blozis 8 under
22 the title Investment Policy, there's an 026 written
23 there.
24 Do you know what that means?

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1 A. At this time I don't recall those numbers, what
 2 they mean.
 3 Q. As well as 025 you don't recall?
 4 A. I do not recall at this time.
 5 Q. And Dreyfus it looks like NJ muni fund sold.
 6 Do you know what that means?
 7 A. As I recall, it would mean that Dreyfus New
 8 Jersey municipal fund was sold out of this account.
 9 Q. So that should just be notes concerning the
 10 account?
 11 A. And those notes would have been written by Bill
 12 Becker if, in fact, he signed.
 13 Q. It would not be written by you?
 14 A. No. Oh, no. That's not my handwriting.
 15 Q. While you were employed and working with Bill
 16 were you given a project of completing the security
 17 list of holders?
 18 A. Could you be more specific?
 19 Q. Have you heard of the term security list of
 20 holders?
 21 A. At this time it sounds vaguely familiar. I'm
 22 not sure.
 23 Q. You're not sure.
 24 (Blozis Deposition Exhibit No. 9 was

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1 accounts that were at one time on the Delaware team on
 2 this sheet that aren't darkened out.
 3 Q. And were you at any point asked to put this
 4 particular sheet together?
 5 A. I don't recall that, I was asked to put a sheet
 6 together.
 7 Q. Looking at the right-hand side handwriting,
 8 have you seen that before today?
 9 A. I don't recall at this time.
 10 Q. Do you recall whether there were any
 11 discussions with Becker about putting information
 12 together for I guess the security list of holders?
 13 A. I don't recall specific discussions.
 14 Q. During the time that you were working with
 15 Mr. Becker did he ever complain to you that you had
 16 put wrong information on asset allocation risk profile
 17 questionnaires?
 18 A. Not to my recollection.
 19 Q. You're familiar with the asset allocation risk
 20 profile questionnaires?
 21 A. I vaguely remember those, yes.
 22 Q. Would those questionnaires have been something
 23 that you would have pulled?
 24 A. They were, they were periodic reviews of...

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1 marked for identification.)
 2 MR. LaROSA: Are all of these copies
 3 redacted or was there an unredacted version of this?
 4 MS. WILSON: The unredacted has the top
 5 four, five taken out. I think what you're seeing
 6 there is probably not redacted but probably
 7 highlighted.
 8 MR. LaROSA: Okay. Okay.
 9 THE WITNESS: I've looked at these.
 10 BY MS. WILSON:
 11 Q. When I was referring to the security list of
 12 holders, I was referring to what that says, what
 13 Blozis 9 says at the top.
 14 A. There's several things written there. What are
 15 you referring to?
 16 Q. Right here (indicating).
 17 A. The security list of holders? I see this
 18 sheet, yes.
 19 Q. Is that the name of this sheet or it has
 20 another name?
 21 A. I wouldn't know if it has another name. It's
 22 what it says at the top of this sheet.
 23 Q. Have you seen Blozis 9 before?
 24 A. I'm not sure at this time. I recognize some

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1 Q. Go ahead. I'm listening.
 2 A. I'm thinking.
 3 Periodic reviews of clients' portfolios.
 4 (Blozis Deposition Exhibit No. 10 was
 5 marked for identification.)
 6 THE WITNESS: I've seen Exhibit 10.
 7 BY MS. WILSON:
 8 Q. Now, you have seen it before today?
 9 A. I don't recollect specifically at this time.
 10 Q. Is your handwriting on any portion of Blozis
 11 10?
 12 A. The numbering looks similar to my handwriting.
 13 I don't see my initials on this page anywhere though.
 14 Q. The asset allocation risk profile
 15 questionnaire, could you tell me for what purpose you
 16 would provide this information?
 17 A. As I said, these were periodic reviews of
 18 clients' portfolios, their asset allocation.
 19 Q. When you say, "periodic," it would be something
 20 that you would do on some sort of regular basis for
 21 all of the clients?
 22 A. Yes.
 23 Q. And would Becker ask you to do it on specific
 24 clients at a specific time?

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1 A. He wouldn't ask.	1 looked at by the investment officer.
2 Q. It would be something that was on your agenda	2 Q. Meaning the information that you provided?
3 to do?	3 A. What information are you referring to?
4 A. These would be automatically produced by the	4 Q. The numbers.
5 company.	5 A. The numbers that would have come from
6 Q. When you say, "automatically produced," what do	6 information gathered by me and put onto a risk profile
7 you mean?	7 questionnaire.
8 A. They would come up on a regular schedule of	8 Q. And looking at the numbers on the right-hand
9 frequency for review based on the size or the holdings	9 side where there's 2's and then there's the total down
10 in the account.	10 there, do you see where I am?
11 Q. So the frequency of the review was something	11 A. Yes.
12 that was prompted by the company?	12 Q. Did you put in the 2's and the total?
13 A. Yes.	13 A. This could have been -- I have no way of
14 Q. And then when it came up for time of review,	14 knowing for sure that this is --
15 then you would run the questionnaire?	15 Q. What you did?
16 A. Yes. Or something that Mellon referred to	16 A. -- what I did. It's not initialed. But it
17 either as a PORCH or a listing of the holdings.	17 would seem consistent that an assistant, a portfolio
18 Q. I have heard the term PORCH before. P-O-R-C-H?	18 assistant would list numbers, maybe taken from a
19 A. Yes.	19 previous review and what it was prior to a change in
20 Q. What is that?	20 the market, and the officer would go and subsequently
21 A. It's a compilation that Mellon had, to the best	21 reallocate or consistently stay with a preceding
22 of my recollection that Mellon had of all the assets	22 review.
23 held within a particular account and to the best of my	23 Q. Ms. Blozis, you referred to portfolio
24 recollection how those holdings fared between reviews.	24 assistant. Is that different from portfolio
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1 Q. If I'm understanding the process, with respect	1 administrator?
2 to the accounts that you were assigned to when it came	2 A. Titles in Mellon seemed to be changing every
3 time to do the questionnaire as dictated by Mellon's	3 other month. A portfolio administrator to the best of
4 policy you would fill in the information?	4 my recollection was synonymous with an assistant. I
5 A. More exact, I would check the previous review.	5 can't recall at this time what the trust officers were
6 This sheet would be handed to an investment assistant	6 called when I last was employed with Mellon.
7 blank. The Investment assistant would then or at	7 Q. Because I have been going under the assumption
8 least I would fill in numbers based on the previous	8 that around 1999 until the time you left your title
9 review. And it would be for the investment officer --	9 was portfolio administrator.
10 looking at this account, it's a \$5 million account.	10 A. I understand that thinking back and portfolio
11 That definitely is something that the decision-making	11 administrating assistant. But I also recollect that
12 process was going to be done by Mr. Becker.	12 the officer, Greg Landis specifically, was called a
13 Q. Because of the amount of the account?	13 portfolio, I believe portfolio administrating officer.
14 A. Absolutely.	14 But in the terms of this context, you're
15 Q. When you say because of the size of the account	15 talking about my position.
16 it's definitely something Becker would have to review,	16 Q. Right.
17 was there any amount that didn't have to be reviewed	17 A. And I agree, yes.
18 by him?	18 Q. With respect to Blozis 10, I believe it's your
19 A. No. The investment officer always had to look	19 testimony -- you're looking at Blozis 10 -- you don't
20 at the reviews, always had to review the allocation	20 know whether you put in the 2's or not?
21 profile.	21 A. At this time I would say it looks consistent
22 Q. Okay. And --	22 with my handwriting, but I wouldn't attest to that
23 A. I referenced this because of the importance of	23 absolutely.
24 the size of this account. It should be more carefully	24 Q. And then I see that the 2's have a strike

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1 through them and next on the right-hand side of the 2 2's there's a line of 1's going down and then it looks 3 like the total has been struck out with another total 4 to the right of it. 5 Is that your striking out or do you know? 6 A. At this time I'm not sure if it is or if it was 7 Becker's, as I said, if this was my handwriting. 8 Q. So the normal process would be you would 9 complete information on the questionnaire, then hand 10 it to Becker for review? 11 A. I said before it was the assistant's 12 responsibility to prepare the paperwork by checking a 13 previous review, inserting numbers that the investment 14 officer may or may not comply with or change based on 15 the market fluctuations, based on the client's desire 16 to reallocate funds. 17 Q. Did you have any discussions with Mr. Becker 18 that he was not pleased with your handling of the 19 profile questionnaires? 20 A. Not that I recall at this specific time. 21 Q. At any point? 22 A. That's a broad question. Could you be more 23 specific? 24 Q. Well, at any point while you were employed at	1 responsibilities that were not indigenous to my job 2 description. 3 Q. Was that in connection with the questionnaire 4 so that he wanted not to have to review it; he wanted 5 you to give it to him and it's going to be the final 6 product, so to speak? 7 A. To the best of my recollection, that's pretty 8 close to what my interpretation was of his attitude 9 and feelings. 10 Q. And you felt that in your position that he was 11 asking too much of you with respect to what your job 12 title was and you were concerned about certain 13 liability issues? 14 A. I was concerned about liability issues. 15 Q. And did you tell him that? 16 A. I don't specifically stating "Bill, I'm 17 concerned about liability issues." 18 I think there was an implied understanding 19 of concern about my feelings. 20 Q. That would have been because of the way you 21 discussed it with him? 22 A. As I recollect that to be the case, yes. 23 Q. Did he agree with you? 24 A. I don't understand did he agree with me.
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1 Mellon did you have any conversations with Mr. Becker 2 in which he stated that he was not happy with how you 3 were completing the asset allocation risk profile 4 questionnaires? 5 A. I recollect that as Bill was in a flux of 6 change from one position to another he was, he was 7 instructing me to ultimately do more for him so that 8 he could make the transition to another, to become a 9 team leader. My concern was that the duties were 10 going to encompass responsibilities for which the 11 liability was not, the liability was something that my 12 level of position should not have been responsible for 13 as described in my job description. 14 Q. Did you go back to him -- I understand your 15 answer. I just wanted to make sure that you actually 16 answer the question that I had asked relating to the 17 risk profile questionnaires, whether he had ever said 18 to you, and I'm paraphrasing just generally, Linda, I 19 don't like how you're doing the work on this; you put 20 in wrong numbers or -- 21 A. I don't recall him ever saying wrong numbers. 22 My recollection is that from his advancement 23 aspirations he was hoping that I would take some of 24 the burden from him and from my aspect it was	1 Q. Well, did he say when you were -- I guess as 2 you said, Ms. Blozis, you never said, "Bill, I'm 3 concerned about liability issues here," but probably 4 in the way you described it led him to believe that 5 that's what you were concerned about. 6 Did he say Linda, yeah, I know you got 7 these liability concerns, but they're really not real 8 or just do it? That's what I meant. 9 A. I don't recollect his agreement at this time. 10 He was on a career aspiration fast track. 11 Q. Do you know whether -- I guess this is 2002 12 time frame just looking at the date, December 2002. 13 Were there other project managers -- I'm 14 sorry -- portfolio administrators in the Philadelphia 15 office? 16 A. You mean portfolio administrative assistants in 17 the 2002? 18 Q. Yes. 19 A. Yes, there were. 20 Q. In sort of the team, the Delaware -- 21 A. In all teams there were. 22 Q. Do you know whether Bill was asking them to 23 provide him with sort of what we have been terming as 24 sort of the final product with respect to the asset

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1 allocation risk profile questionnaires?
 2 **A. I have no absolute knowledge of that at this**
 3 **time.**
 4 Q. You had mentioned the PORCH. I guess that's an
 5 analysis?
 6 **A. To the best of my recollection, yes.**
 7 Q. Were you ever asked to put one of those
 8 together?
 9 **A. I'm not an analyst. I was never an analyst.**
 10 Q. Were you ever asked to provide information
 11 having to do with the PORCH?
 12 **A. My recollection is that the administrative**
 13 **assistants would run a PORCH. You would key in**
 14 **numbers on a client. You would get that information**
 15 **produced to the best of my recollection or have them**
 16 **sent from the department that produced those and you**
 17 **would assemble that information for the investment**
 18 **officers.**
 19 Q. Was there ever any conversation that you had
 20 with, say, Mr. Becker or Mr. Landis or Mr. Gilmore
 21 that you hadn't provided information in connection
 22 with the PORCH?
 23 **A. Not to my recollection at this time.**
 24 Q. When you were reporting to Mr. Becker, did he

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1 **particular client or account.**
 2 Q. So it's my understanding, Ms. Blozis, you would
 3 not have anything to do with running the sheet or
 4 obtaining the information?
 5 **A. The assistant may have been told or instructed**
 6 **by the investment officer to put through or**
 7 **initiate -- let me be succinct.**
 8 **To input the data to purchase the bond.**
 9 **It was never ultimately completed without the**
 10 **investment officer approving it. And I'm looking at**
 11 **the way it says order number added. An officer would**
 12 **have, to the best of my remembrance an officer would**
 13 **have had to okay this buy for this amount of money in**
 14 **order to produce that number, that order number on the**
 15 **lower left side.**
 16 Q. Do you remember having any discussions with
 17 Mr. Becker concerning this particular single bond buy
 18 sheet as it relates to it looks like a hospital
 19 client?
 20 **A. Not to my knowledge at this time.**
 21 Q. I'm just looking at where it says par value
 22 800,000, there's a circle and then a line and it looks
 23 to be that he's saying it should be 400,000.
 24 **A. "Per attached" it says.**

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1 ever complain that you had provided incorrect
 2 information on single bond buy sheets?
 3 **A. I don't recall that at this time.**
 4 Q. You have heard of single bond buy sheets?
 5 **A. I'm not sure I recollect those.**
 6 **(Blozis Deposition Exhibit No. 11 was**
 7 **marked for identification.)**
 8 THE WITNESS: I've seen this exhibit.
 9 BY MS. WILSON:
 10 Q. Have you seen it before today?
 11 **A. I don't recall specifically if I have or have**
 12 **not. I will admit that I recognize the name of the**
 13 **client attached thereto.**
 14 Q. This is what I was referring to when I said
 15 single bond buy sheets.
 16 Would this be a sheet that you would put
 17 together?
 18 **A. No.**
 19 Q. Would you run information concerning the
 20 client?
 21 **A. To the best of my recollection, this would be a**
 22 **sheet that would have been produced upon the**
 23 **instruction of the investment officer or even his own,**
 24 **by his own hand to, as I recollect, buy a bond for a**

1 **Where is the attachment?**
 2 Q. Let me just ask you this question: Do you
 3 remember having any conversations with him about the
 4 par value being something other than 800,000?
 5 **A. In reference to this client?**
 6 Q. Yes.
 7 **A. I don't recollect.**
 8 Q. Do you remember having any discussions with
 9 Mr. Becker about his, about not being attentive to
 10 detail as it relates to the single bond buy sheets?
 11 **A. Not at this time, no, I don't.**
 12 Q. Do you remember having any conversations with
 13 Mr. Becker, and it's more expansive than Blozis 11,
 14 but do you remember having any discussions with
 15 Mr. Becker about his view that you were not being
 16 attentive to detail with respect to your work?
 17 **A. My only recollection is the December review, I**
 18 **think. I'm not sure at this time.**
 19 Q. So you recall it coming up at the December
 20 review, but prior to the review you don't remember?
 21 **A. That's correct.**
 22 Q. Prior to your review in December -- I guess
 23 actually it was January 27, '03, right, your next
 24 review?

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1 **A. To the best of my memory.**
 2 Q. Prior to that review, we'll call it the '03
 3 review, did Mr. Becker complain to you that he thought
 4 you weren't following instructions as it related to
 5 customer files?
 6 **A. To my recollection, Bill and I were having**
 7 **fewer and fewer communications based on his transition**
 8 **from the senior investment officer in Delaware to the**
 9 **new team.**
 10 Q. But do you remember him raising that with you,
 11 that issue, failure to follow instructions concerning
 12 client files?
 13 **A. Specifically, no, I do not remember.**
 14 Q. Turn back to Blozis 10.
 15 Do you recall getting any asset allocation
 16 risk profile questionnaires back from Mr. Becker with
 17 any comments on it?
 18 **A. Not at this time, no, I don't recall.**
 19 Q. You don't recall that.
 20 Do you recall having any discussions with
 21 him concerning the asset allocation risk profile
 22 questionnaires in which he would say, for example,
 23 Linda, you gave me this; I thought the code should
 24 have been different or there was information on it

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1 me printed from Bill Becker's PC where I state that
 2 this is the first I've seen the notification and, if
 3 memory serves, I believe I provided information about
 4 correspondence with Fredric Levine, who was to my
 5 recollection a mutual fund analyst, but I'm not sure
 6 at this time if it was in reference to this account
 7 number. It doesn't mention a name tied to that
 8 account number.
 9 Q. Do you remember seeing the handwritten portion
 10 of Blozis 12 before today?
 11 **A. No, I do not recall seeing the handwritten. I**
 12 **have no way of knowing at what time or what date those**
 13 **instructions were written.**
 14 Q. Did you have any discussions with Mr. Becker
 15 about this particular account overdraft and that's
 16 referenced in Blozis 12 in which he stated that he
 17 felt you were inattentive to detail and didn't follow
 18 instructions?
 19 **A. No, I did not.**
 20 Q. Have you heard of an investment review sheet or
 21 form?
 22 **A. That sounds familiar, yes.**
 23 Q. Did you have any responsibility of pulling
 24 those forms?

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1 that I thought was incorrect?
 2 **A. What's your question, please?**
 3 MS. WILSON: Can you please repeat it?
 4 (The reporter read back the last
 5 question.)
 6 THE WITNESS: At this time, no, I don't
 7 recall.
 8 (Blozis Deposition Exhibit No. 12 was
 9 marked for identification.)
 10 THE WITNESS: I've reviewed Exhibit 12.
 11 BY MS. WILSON:
 12 Q. Have you seen Exhibit 12 before today?
 13 **A. I have a recollection of an exchange between**
 14 **Fredric Levine on a matter. I'm not sure I recollect**
 15 **it was this account number.**
 16 **That's my answer.**
 17 Q. All right. Do you remember having any
 18 discussions with Mr. Becker about this particular
 19 account?
 20 **A. Discussions would imply face to face. As I**
 21 **recollect, on December 9th Bill Becker was spending**
 22 **more and more time in Philadelphia. Communications**
 23 **were reduced to telephone calls or e-mails.**
 24 This appears to be a response e-mail from

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1 **A. To my recollection, the investment review forms**
 2 **was the original name of the automated review systems**
 3 **or risk questionnaire forms.**
 4 Q. Was it similar to Blozis 10 when you say risk
 5 questionnaires?
 6 **A. To the best of my memory, they were the**
 7 **predecessor of those forms.**
 8 Q. Did you ever have any discussions with
 9 Mr. Becker in which he felt that you had provided
 10 incorrect information on the investment review forms?
 11 **A. Not at this time, no, I don't have a**
 12 **recollection.**
 13 Q. When I say discussions, I'm meaning it more
 14 broadly than face to face. I mean it in terms of a
 15 telephone call, e-mail exchange, paper exchange.
 16 **A. I still feel your question is very broad. I**
 17 **can't say specifically at this time that there were**
 18 **discussions that Bill said I provided incorrect**
 19 **information.**
 20 Q. Meaning you don't remember either way?
 21 **A. At this time I don't remember either way.**
 22 Q. Was there ever any discussions with Mr. Becker
 23 and yourself concerning putting together a stale price
 24 report?

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1 A. That sounds vaguely familiar, yes.	1 A. To the best of my recall, I did not when I left
2 Q. Was there ever any discussions with Mr. Becker	2 Mellon.
3 about you not putting together the stale price report	3 Q. Do you recall having any discussions with Bill
4 on time?	4 Becker concerning putting together books for a client
5 A. I recall discussing or talking or communicating	5 with the last name Fox?
6 with Bill somewhat about what I recollect to be a	6 A. We would have talked about preparations for
7 stale pricing report.	7 that particular client, family, yes.
8 Q. And what do you recall?	8 Q. And was there any discussion that Becker felt
9 A. Not very much at this time.	9 that you hadn't put together the books?
10 Q. Do you recall whether he was upset or concerned	10 A. I don't recall at this time.
11 about not having it?	11 Q. Do you recall there being any discussion about
12 A. My recollections at this time was another	12 your performance on the Fox account?
13 instance of a project that was forced on me because	13 A. To my recollection, Bill was working out of the
14 either Bill Becker or Greg Landis or predecessor	14 Philadelphia office. The Philadelphia office had
15 investment officers did not complete a pricing report	15 superior facilities to obtain information on high-end
16 that was becoming very stale dated and they looked to	16 clients.
17 Linda to put the blame. That's my recollection at	17 I recollect he was working with a young
18 this time.	18 lady of Oriental extraction. I don't recall her name.
19 Q. And who had asked you to put it together?	19 Jin Song was her name and she would
20 A. I recall that initially it was Bill Becker and	20 produce a lot of that information for Bill or compile
21 then Greg Landis.	21 for Bill while he was in Philadelphia.
22 Q. The way that you characterized that piece of it	22 Q. Do you recall any discussion that you were
23 earlier sounded like it was your view that it should	23 supposed to be compiling information or putting
24 have been done some time ago by other people, Becker,	24 together books that you hadn't completed, hadn't done?
<hr/>	
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1 Landis or predecessor investment officers?	1 A. Discussion? I don't recall specific -- in
2 A. That's what I -- yes.	2 trying to recollect those last months when Bill was in
3 Q. I think you had said it was kind of dumped on	3 a state of flux, it was not always made clear what
4 you or you felt it was dumped on you.	4 files or accounts he was working on, which ones would
5 A. Yes.	5 be taken over in the transition period by Brendan
6 Q. And why do you feel when you use -- I may be	6 Gilmore and essentially who was doing what job. If a
7 paraphrasing, but it sounded like that's what you were	7 booklet was sent to me to assemble, I assembled the
8 saying, that you just felt give it to Linda to do	8 booklet.
9 because we haven't done it type of an approach.	9 Q. So based on your recollection, Ms. Blozis,
10 A. To my recollection, that's what I recall that	10 there was not an issue concerning the assemblage of
11 happened with the stale pricing report.	11 books for the Fox account?
12 Q. Did you at any point say, I shouldn't be doing	12 A. Not to the regard that it jeopardized the
13 this or someone else should have done it some time	13 client's status that I can recall at this time.
14 ago?	14 Q. Not going to the extent that it jeopardized the
15 A. I recollect that I mentioned that in a	15 client's status, but was there ever any communication
16 non-assertive way but distinct way to both of them,	16 or discussion that books hadn't been put together for
17 but at the time did not protest vehemently because I	17 the Fox account?
18 was concerned about my job.	18 A. I believe towards the last months of my employ
19 Q. And you brought it up to Becker and Landis?	19 that Bill while he was still in a somewhat supervisory
20 A. Yes. As I recollect, yes.	20 position he was becoming critical of my assemblage of
21 Q. And what did they say?	21 client review booklets, unfoundedly, unfoundedly.
22 A. As I recall, they said it essentially was on my	22 Q. And you believe Fox was one of them?
23 shoulders now to do.	23 A. It could have been, yes.
24 Q. Did you complete that project?	24 Q. When you say, "unfoundedly," why do you say it

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<p>1 was unfounded?</p> <p>2 A. As I previously stated, he was in a state of</p> <p>3 flux between wrapping up or what would appear to be</p> <p>4 wrapping up his involvement with accounts that were</p> <p>5 part of our team and then moving on to his position as</p> <p>6 a team leader and he was more and more frequently</p> <p>7 working in Philadelphia with better facilities to his</p> <p>8 avail and it wasn't always made perfectly clear where</p> <p>9 responsibilities began and ended as far as assistance</p> <p>10 was concerned.</p> <p>11 Q. So to paraphrase, you felt that because he was</p> <p>12 in a state of flux that it wasn't always clear what</p> <p>13 you should be doing and what he wanted you to do for</p> <p>14 particular accounts?</p> <p>15 A. My recollection is yes, that it wasn't always</p> <p>16 clear.</p> <p>17 Q. Did you ever say that to Bill?</p> <p>18 A. I recollect I did.</p> <p>19 Q. And what did he say?</p> <p>20 A. I don't recall specifically what he answered,</p> <p>21 but I don't seem to recall getting a defined</p> <p>22 definition of where the duties began and ended with</p> <p>23 the Delaware support team.</p> <p>24 Q. During the period that you reported to Bill</p>	<p>1 do with Becker.</p> <p>2 First of all, let me ask you do you feel</p> <p>3 that Bill Becker acted in a way that was</p> <p>4 discriminatory towards you because of your age?</p> <p>5 A. Yes.</p> <p>6 Q. And because of your gender?</p> <p>7 A. Yes.</p> <p>8 Q. Let's start with age.</p> <p>9 Can you give me the reasons why you feel</p> <p>10 that Bill Becker was acting discriminatory against you</p> <p>11 because of your age?</p> <p>12 A. I can't give you specific reasons at this time.</p> <p>13 I can only state that from my recollection when I</p> <p>14 first worked for Bill in the early months and years he</p> <p>15 seemed to be very satisfied with my employment and my</p> <p>16 performance and especially after Kathleen Agne's</p> <p>17 dismissal I felt that they were very appreciative of</p> <p>18 all of the extra effort I was putting forth because I</p> <p>19 was doing double duty. And it evolved to a point</p> <p>20 where I didn't understand Bill's change in attitude</p> <p>21 and criticism of my work.</p> <p>22 And all I could determine was that he</p> <p>23 became a pawn for Brendan Gilmore's plan to dismiss</p> <p>24 the last surviving, to quote his own word, the</p>
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<p>1 Becker, did he ever raise any issues with respect to</p> <p>2 your performance on the Lickle, L-i-c-k-l-e, account?</p> <p>3 A. Let me think about that name.</p> <p>4 I don't recall a specific.</p> <p>5 Q. You don't recall the Lickle account?</p> <p>6 A. I recall the Lickle name. I don't recall</p> <p>7 specific discussions or criticisms from Bill.</p> <p>8 Q. Do you recall any criticisms on Lickle by</p> <p>9 Landis or Gilmore?</p> <p>10 A. No, not specifically.</p> <p>11 Q. Before we took our break and maybe afterwards</p> <p>12 we had gone through the reasons why you felt that</p> <p>13 Gilmore had acted in a way that was discriminatory</p> <p>14 because of age and gender and you gave me a list of</p> <p>15 reasons.</p> <p>16 Do you recall that?</p> <p>17 A. Repeat your question. Before or after the</p> <p>18 break we --</p> <p>19 Q. During the course of your testimony today you</p> <p>20 had given a list of reasons why you thought Gilmore</p> <p>21 had acted in a way that was discriminatory because of</p> <p>22 your age and your gender.</p> <p>23 A. I recall us talking about that.</p> <p>24 Q. I want to ask you the same question having to</p>	<p>1 survivor of the original team. So I could only</p> <p>2 conclude that it was discrimination against me as far</p> <p>3 as age and gender.</p> <p>4 Q. With respect to Becker, did you ever hear him</p> <p>5 make any comments that you considered to be</p> <p>6 anti-older-worker related?</p> <p>7 A. I don't recall at this time.</p> <p>8 Q. What about anti-woman comments?</p> <p>9 A. Towards?</p> <p>10 Q. Towards you or anyone else.</p> <p>11 A. Not towards me at this time, but there might</p> <p>12 have been instances when comments were made about</p> <p>13 older women in the Philadelphia office.</p> <p>14 Q. By Bill?</p> <p>15 A. As I recollect, perhaps, yes.</p> <p>16 Q. What do you remember?</p> <p>17 A. Nothing specific at this time.</p> <p>18 Q. Were those comments that you overheard or</p> <p>19 comments that people told you about?</p> <p>20 A. I'm not sure at this time if they were either.</p> <p>21 Q. You're not sure what they were in terms of</p> <p>22 older women in Philadelphia?</p> <p>23 A. I'm not sure.</p> <p>24 Q. Do you remember whether he used the words older</p>

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<p>Page 210</p> <p>1 women?</p> <p>2 A. I don't believe he -- I don't recollect him</p> <p>3 using older women, but if a name was mentioned</p> <p>4 everyone was aware of that person's age or status</p> <p>5 within the company as far as years in.</p> <p>6 Q. But you don't remember specifically what it</p> <p>7 was?</p> <p>8 A. Not at this time.</p> <p>9 Q. Do you remember the time?</p> <p>10 A. Meaning time of day, time of year?</p> <p>11 Q. The time frame in which -- I understand you</p> <p>12 said you don't remember.</p> <p>13 A. Not specifically, no.</p> <p>14 Q. I didn't ask you about Gilmore. Did you ever</p> <p>15 hear him make any anti-women comments?</p> <p>16 A. At this time I don't recollect.</p> <p>17 Q. Do you feel that Becker started to be more</p> <p>18 critical of your job performance when he was trying to</p> <p>19 move on to get his own team?</p> <p>20 A. Yes.</p> <p>21 Q. Did you ever hear Becker and Gilmore have any</p> <p>22 discussions about getting rid of the older employees?</p> <p>23 A. No.</p> <p>24 Q. Or getting rid of you?</p>	<p>Page 211</p> <p>1 A. I don't recall at this time.</p> <p>2 Q. What about anti-women comments to you or to</p> <p>3 others?</p> <p>4 A. I don't recall at this time.</p> <p>5 Q. And did you ever hear any discussions between</p> <p>6 Greg or Becker or Gilmore in which they were talking</p> <p>7 about getting you out of the company?</p> <p>8 A. I didn't hear specific discussions. They would</p> <p>9 meet frequently behind closed doors.</p> <p>10 Q. And because they were behind closed doors, you</p> <p>11 don't know what they were talking about, correct?</p> <p>12 A. Correct.</p> <p>13 Q. Now, I've asked you about Becker, Gilmore and</p> <p>14 Landis as it relates to age discrimination and sex</p> <p>15 discrimination, sex or gender discrimination.</p> <p>16 Were there others at Mellon that you're</p> <p>17 claiming also engaged in age discrimination and sex</p> <p>18 discrimination against you?</p> <p>19 A. Specifically, I don't recall naming others than</p> <p>20 Gilmore, Becker or Landis at this time.</p> <p>21 Q. Is it those three?</p> <p>22 A. Mm-hmm.</p> <p>23 Q. Now, with respect to your employment,</p> <p>24 Ms. Blozis, did you ever keep a diary of events?</p>
<p>Page 212</p> <p>1 A. Did I hear, overhear discussions?</p> <p>2 Q. Yes.</p> <p>3 A. I can't say at this time that I heard specific</p> <p>4 discussions, no.</p> <p>5 Q. I know we haven't talked about the period of</p> <p>6 time that you started working with Landis, but while</p> <p>7 we're on it I want to sort of finish this out.</p> <p>8 With respect to Greg Landis, are you</p> <p>9 claiming that Greg Landis acted in a way that was</p> <p>10 discriminatory towards you because of your age or</p> <p>11 gender?</p> <p>12 A. I recollect that Greg was also acting on behalf</p> <p>13 of Brendan Gilmore to subsequently get me dismissed.</p> <p>14 Q. When you say that, is that similar to what you</p> <p>15 were saying with Bill and that you felt that Greg like</p> <p>16 Bill was acting as a pawn for Gilmore?</p> <p>17 A. Yes.</p> <p>18 Q. And you felt that was because of your age?</p> <p>19 A. Yes.</p> <p>20 Q. And because of your gender?</p> <p>21 A. Yes.</p> <p>22 Q. Did Greg Landis ever make any comments that you</p> <p>23 felt to be anti-age comments, either to you or to</p> <p>24 others?</p>	<p>Page 213</p> <p>1 A. A diary?</p> <p>2 Q. Right. In terms of a day, you write in today</p> <p>3 met with Gilmore?</p> <p>4 A. For what purpose?</p> <p>5 Q. Any purpose. Some people keep diaries or</p> <p>6 Day-Timers of things that happened every day on the</p> <p>7 job.</p> <p>8 A. My recollection is that if we discussed client</p> <p>9 situations that notations might have been put in a</p> <p>10 file or ticklers created as I recall to bring up</p> <p>11 discussions or topics necessary for the client.</p> <p>12 Q. So it would be client-related information that</p> <p>13 you would be memorializing?</p> <p>14 A. I wouldn't say memorializing. I would say</p> <p>15 documenting or...</p> <p>16 Q. I was thinking more in terms of some people --</p> <p>17 for example, looking at Blozis 4, you made a little</p> <p>18 note at the bottom that you spoke to Rosemary on a</p> <p>19 particular day. Some people instead of putting it on</p> <p>20 the bottom of something will put it in an actual</p> <p>21 calendar or a Day-Timer of that nature.</p> <p>22 Did you keep one of those while you were</p> <p>23 employed?</p> <p>24 A. I didn't keep a specific diary.</p>